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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

SASA MASLIC, individually and on behalf
of putative class, IVAN DRZAIC, ROBERT
HERNAUS, LEOPOLD HUBEK, LEON
HUDOLDETJAK, ELVIS KOSCAK,
TOMICA PANIC, STJEPAN PAPES,
ZELJKO PULJKO, DARKO SINCEK,
DAVID STANTE, NEDELJKO ZIVANIC,
GOGO REBIC, and MITJA POGOREVC,

Plaintiffs,

v.

ISM VUZEM D.O.O., ISM VUZEM USA,
INC., VUZEM USA, INC., HRID-MONT
D.O.O., IVAN VUZEM, ROBERT VUZEM,
EISENMANN CORPORATION, TESLA,
INC., and DOES 1 THROUGH 50,

Defendants.

Case No. 5:21-cv-2556-BLF

**JOINT STIPULATION FOR PROPOSED
ORDER SETTING DEADLINES**

Hon. Beth Labson Freeman
Courtroom 3, 5th Floor

1 Plaintiffs Sasa Maslic, Ivan Drzaic, Robert Hernaus, Leopold Hubek, Leon Hudoldetnjak,
2 Elvis Koscak, Tomica Panic, Stjepan Papes, Zeljko Puljko, Darko Sincek, David Stante, Nedeljko
3 Zivanic, Goran “Gogo” Rebic, and Mitja Pogorevc (“Plaintiffs”) and Defendants Eisenmann
4 Corporation (“Eisenmann”) and Tesla, Inc. (“Tesla”) (collectively, the “Parties”) hereby
5 respectfully submit this Stipulation for Order Setting Discovery Cut-off and Expert
6 Disclosure Deadlines pursuant to CASE MANAGEMENT ORDER (Dkt. No. 79). The Parties
7 propose:

8 Plaintiffs shall file a motion for class certification by February 1, 2023

9 Plaintiffs shall disclose experts by January 16, 2024

10 Defendants shall disclose experts by March 1, 2024

11 Any rebuttal expert disclosures shall be made by April 1, 2024

12 The close of all fact discovery, including all discovery motions, shall be April 1, 2024

13 The close of all expert discovery, including all discovery motions, shall be May 1, 2024

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15 Dated: May 27, 2022

/s/

William C. Dresser
Counsel for Plaintiffs

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19 Dated: May 27, 2022

/s/

Aaron Bernay
Counsel for Eisenmann Corporation

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21
22 Dated: May 27, 2022

/s/

Aaron Langberg
Counsel for Tesla, Inc.

FILER'S ATTESTATION

Pursuant to Civil L.R. 5-1(i)(3), I, William C. Dresser, hereby attest that concurrence in the filing of this document has been obtained from each of the above signatories.

Dated: May 27, 2022

/s/
William C. Dresser
Counsel for Plaintiffs
Sasa Maslic, et al